

EXHIBIT 2

EXHIBIT A


U.S. Patent No. 8,223,775 (the “’775 Patent”) Exemplary Infringement Chart

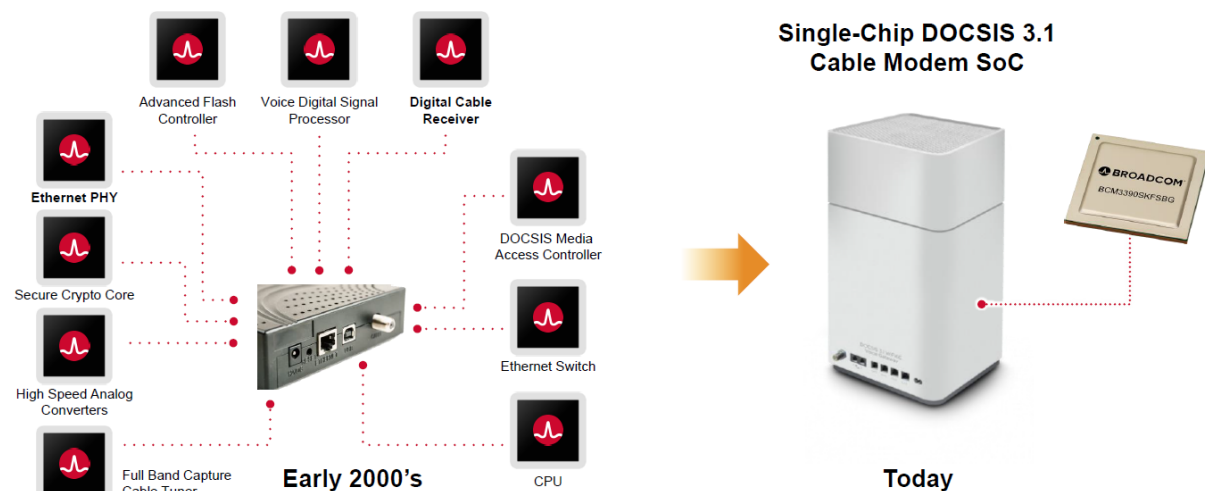
Comcast operates and maintains a nationwide television and data network through which it sells, leases, and offers for sale products and services, including the Technicolor TC8717 cable modem, Technicolor CGM4140 cable modem, Technicolor CGM4331 cable modem, and products that operate in a similar manner (“Accused Cable Modem Products”), as well as the Arris AX013ANC STB, Arris AX013ANM STB, Arris AX014ANC STB, Arris AX014ANM STB, Arris MX011ANC STB, Arris MX011ANM STB, Pace PX013ANC STB, Pace PX013ANM STB, Pace PX022ANC STB, Pace PX022ANM STB, Samsung SX022ANC STB, Samsung SX022ANM STB, and products that operate in a similar manner (“Accused Set Top Products”). Comcast provides cable television and internet services (“Accused Services”) via the lease, sale, and/or distribution of the Accused Cable Modem Products and/or the Accused Set Top Products. Comcast literally and/or under the doctrine of equivalents infringes the claims of the ’775 Patent by making, using, selling, offering for sale, and/or importing the Accused Services, Accused Cable Modem Products, and/or the Accused Set Top Products.

As shown below in the chart with exemplary support, the Accused Services infringe at least claims 18 and 19 of U.S. Patent No. 8,223,775 (“’775 Patent”). The ’775 Patent was filed September 30, 2003, issued July 17, 2012, and is entitled “Architecture for a Flexible and High-Performance Gateway Cable Modem.”

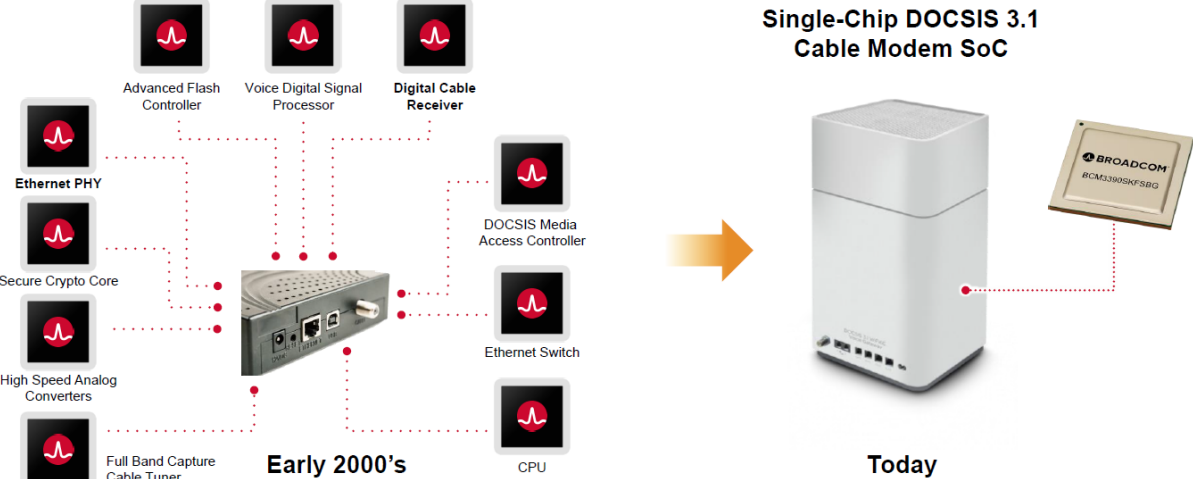
The Accused Services are provided by the claimed cable modem system by utilizing, for example, at least one Accused Cable Modem Product located at each subscriber location. The Accused Cable Modem Products infringe the claims of the ’775 Patent, as described below, either directly under 35 U.S.C. § 271(a), or indirectly under 35 U.S.C. §§ 271(b)–(c).

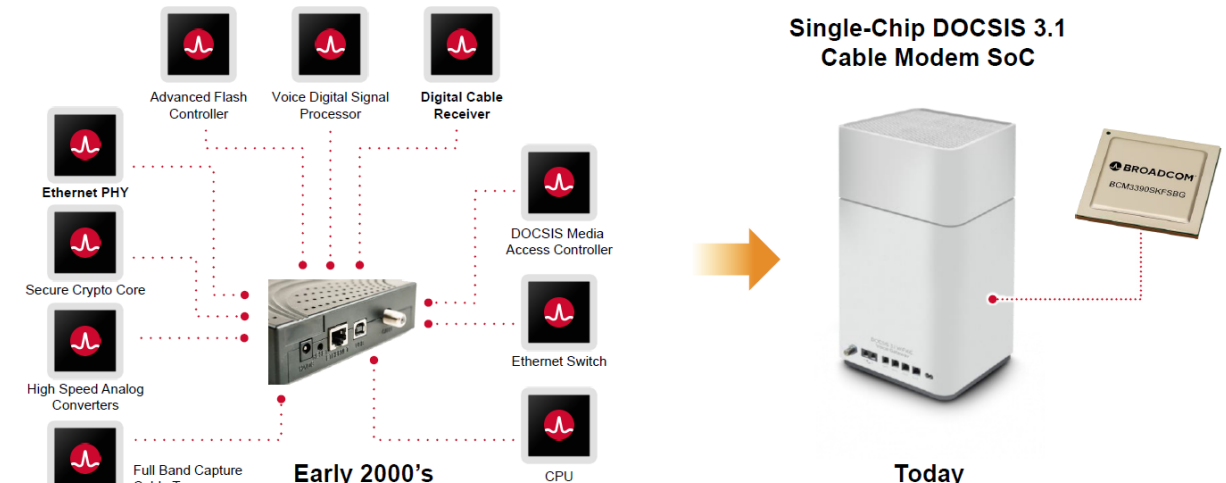
#	U.S. Patent No. 8,223,775	Accused Products and Services
18pre	A cable modem system comprising:	The Accused Services are provided by the claimed cable modem system by utilizing, for example, at least one Accused Cable Modem Product located at each subscriber location, including, for example, the Technicolor TC8717 cable modem, Technicolor CGM4140 cable modem, Technicolor CGM4331 cable modem, and products that operate in a similar manner. By way of example, the Technicolor CGM4140 cable modem is charted herein.
18a	a data networking engine implemented in a first circuit that includes at least one processor, the data networking engine programmed with software that when executed by the at least one processor of the first circuit causes the data networking engine to perform home networking functions including interfacing with customer provided equipment;	<p>The Accused Cable Modem Products include a data networking engine implemented in a first circuit that includes at least one processor, the data networking engine programmed with software that when executed by the at least one processor of the first circuit causes the data networking engine to perform home networking functions including interfacing with customer provided equipment as described below.</p> <p>Specifically, the Technicolor CGM4140 includes circuitry and/or applicable software modules constituting a data networking engine. For example, the Technicolor CGM4140 has a Broadcom BCM3390 SoC.</p>

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		<div data-bbox="705 251 1864 1122"></div> <p data-bbox="697 1177 1942 1382">The Technicolor CGM4140, via at least in part by the Broadcom BCM3390, any other circuitry, and/or applicable software modules, has a dedicated cable modem CPU, a dedicated multi-threaded applications processor, and multiple hardware off-load engines. The multi-threaded applications processor implements a data networking engine. The data networking engine performs home networking functions including interfacing with customer provided equipment.</p>

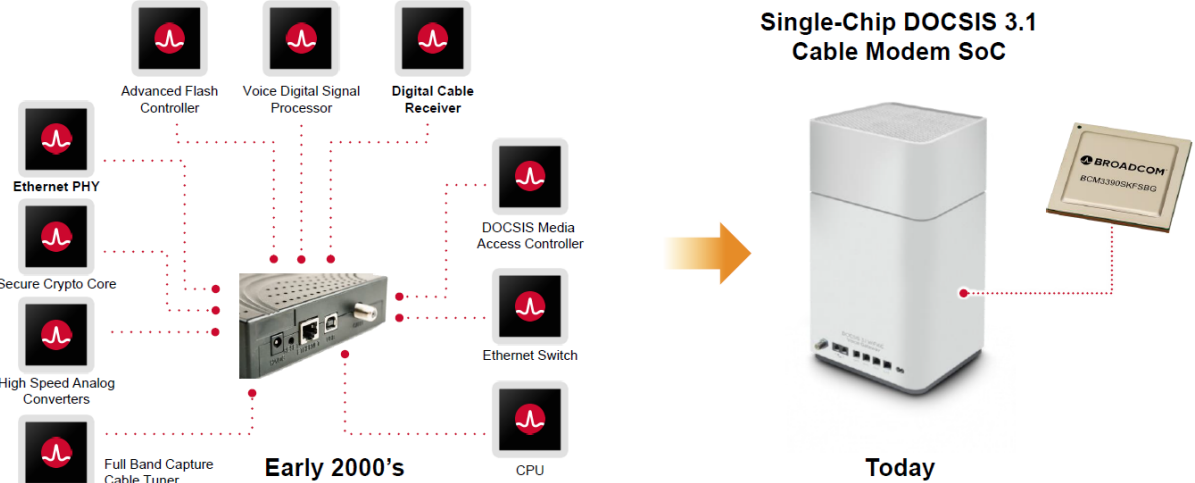
#	U.S. Patent No. 8,223,775	Accused Products and Services
		<p data-bbox="730 238 1791 277">Integration Drives Improved Performance, Cost and Power</p>  <p data-bbox="695 800 1633 833">(ENTROPIC_COMCAST_001991 at ENTROPIC_COMCAST_002009)</p> <p data-bbox="695 885 1942 1040">Discovery will provide detailed information regarding implementation and identification of the specific components, source code, software and/or other instrumentalities used to implement the claimed system. As additional information is obtained through discovery related to the Accused Services and related instrumentalities, Entropic will supplement these contentions.</p>
18b	a cable modem engine implemented in a second circuit that includes at least one processor, the second circuit being separate from the first circuit, the cable modem engine programmed with software that when executed by the at least one processor of the second	The Accused Cable Modem Products have a cable modem engine implemented in a second circuit that includes at least one processor, the second circuit being separate from the first circuit, the cable modem engine programmed with software that when executed by the at least one processor of the second circuit causes the cable modem engine to perform cable modem functions other than the home networking functions performed by the data networking engine, the cable modem functions including interfacing with cable media, and the cable modem engine configured to enable upgrades to its software in a manner that is independent of upgrades to the software of the data networking engine, the cable modem engine including a DOCSIS controller and a DOCSIS MAC processor, the DOCSIS MAC processor configured to process downstream PDU packets and

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	<p>circuit causes the cable modem engine to perform cable modem functions other than the home networking functions performed by the data networking engine, the cable modem functions including interfacing with cable media, and the cable modem engine configured to enable upgrades to its software in a manner that is independent of upgrades to the software of the data networking engine, the cable modem engine including a DOCSIS controller and a DOCSIS MAC processor, the DOCSIS MAC processor configured to process downstream PDU packets and forward the processed packets directly to the data networking engine without the involvement of the DOCSIS controller in order to boost downstream throughput; and</p>	<p>forward the processed packets directly to the data networking engine without the involvement of the DOCSIS controller in order to boost downstream throughput as described below.</p> <p>Specifically, the Technicolor CGM4140 includes circuitry and/or applicable software modules constituting a dedicated cable modem CPU, a dedicated multi-threaded applications processor, and multiple hardware off-load engines. The cable modem CPU provides a cable modem engine. The cable modem CPU is separate from the multi-threaded applications processor and the hardware off-load engines. On informed belief, the cable modem CPU utilizes an eCOS operating system and the multi-threaded applications processor utilizes a Linux operating system. Accordingly, upgrades to the cable modem engine are independent of upgrades to the data networking engine. The cable modem CPU implements the cable modem engine. Upon information and belief, the cable modem engine includes a DOCSIS controller and a DOCSIS MAC processor, the DOCSIS MAC processor configured to process downstream PDU packets and forward the processed packets directly to the data networking engine without the involvement of the DOCSIS controller in order to boost downstream throughput.</p>

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18c	a data bus that connects the data networking engine to the cable	The Accused Cable Modem Products have a data bus that connects the data networking engine to the cable modem engine, wherein the cable modem functions performed by the cable modem

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	<p>modem engine, wherein the cable modem functions performed by the cable modem engine are completely partitioned from the home networking functions performed by the data networking engine.</p>	<p>engine are completely partitioned from the home networking functions performed by the data networking engine as described below.</p> <p>Specifically, the Technicolor CGM4140 includes circuitry and/or applicable software modules constituting a dedicated cable modem CPU, a dedicated multi-threaded applications processor, and multiple hardware off-load engines. The multi-threaded applications processor provides the data networking engine and the cable modem CPU provides the cable modem engine. The cable modem CPU is separate from, the multi-threaded applications processor. Accordingly, the cable modem functions performed by the cable modem engine are completely partitioned from the home networking functions performed by the data networking engine. The cable modem CPU communicates with the multi-threaded applications processor using a data bus. Accordingly, the data bus connects the data networking engine and the cable modem engine.</p> <p style="text-align: center;">Integration Drives Improved Performance, Cost and Power</p>  <p style="text-align: center;">(ENTROPIC_COMCAST_001991 at ENTROPIC_COMCAST_002009)</p>

#	U.S. Patent No. 8,223,775	Accused Products and Services
		<p>bcm3390</p> <hr/> <p>Known platforms:</p> <ul style="list-style-type: none">• Motorola/Arris/Commscope SB8200/CM8200 (Linux kernel + eCos source: Commscope SourceForge 8200) <p>(ENTROPIC_COMCAST_001921 at ENTROPIC_COMCAST_001926)</p> <p>Discovery will provide detailed information regarding implementation and identification of the specific components, source code, software and/or other instrumentalities used to implement the claimed system. As additional information is obtained through discovery related to the Accused Services and related instrumentalities, Entropic will supplement these contentions.</p>
19	A cable modem system as claimed in claim 18, wherein all DOCSIS functions are localized in the cable modem engine.	<p>In the Accused Cable Modem Products, all DOCSIS functions are localized in the cable modem engine as described below.</p> <p>Specifically, the Technicolor CGM4140 includes circuitry and/or applicable software modules constituting a dedicated cable modem CPU, a dedicated multi-threaded applications processor, and multiple hardware off-load engines. The DOCSIS functions are localized in the cable modem CPU.</p>

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		<p data-bbox="732 237 1793 277">Integration Drives Improved Performance, Cost and Power</p>  <p data-bbox="695 797 1633 833">(ENTROPIC_COMCAST_001991 at ENTROPIC_COMCAST_002009)</p> <p data-bbox="705 889 867 927">bcm3390</p> <p data-bbox="705 976 882 1000">Known platforms:</p> <ul data-bbox="743 1024 1860 1049" style="list-style-type: none"> • Motorola/Arris/Commscope SB8200/CM8200 (Linux kernel + eCos source: Commscope SourceForge 8200) <p data-bbox="695 1073 1633 1109">(ENTROPIC_COMCAST_001921 at ENTROPIC_COMCAST_001926)</p> <p data-bbox="695 1162 1940 1321">Discovery will provide detailed information regarding implementation and identification of the specific components, source code, software and/or other instrumentalities used to implement the claimed system. As additional information is obtained through discovery related to the Accused Services and related instrumentalities, Entropic will supplement these contentions.</p>